

EXHIBIT A-16



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May 1, 2024

VIA EMAIL TO LHARDMAN@HSK-LAW.COM

Lyle R. Hardman
Hunt Suedhoff Kearney LLP
205 W. Jefferson Blvd., Ste 300
South Bend, IN 46601

**Re: Meet and Confer Summary
Case No. 3:23-cv-00699 - Nickels and Dimes Inc. v. Noah's Arcade, LLC**

Dear Mr. Hardman:

This letter summarizes our meet and confer on April 29, 2024. We discussed your client identifying which goods have the Challenged Mark in response to Interrogatory No. 2, confirming the dates of first use for each identified good or service in response to Interrogatory No. 3, and supplementing the response to Interrogatory No. 6 to include, for example, Noah Arcade's Facebook page.

For Document Requests, we discussed the Requests identifying certain types of information concerning the subject of the Request. You agreed to review the Review the Document Requests again and ask your client to search for responsive documents. For example, you will ask your client for:

- The ESI for the Facebook post in response to Document Request No. 2;
- Any analytics data about the reach of any marketing channels used by Noah's Arcade, for example, the Google Analytics data in response to Document Request No. 4;
- The prosecution history from the USPTO and full correspondence with Trademark Engine in response to Document Requests No. 5 and 6;
- The customer information collected by Noah's Arcade from sources such as the Web forms on its website in response to Document Request No. 10;

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- Full day-to-day financial information from June 8, 2022 through December 31, 2022, and that same information for all of 2023, and the beginning of this year to the present in response to Document Requests No. 12 and 13.

You agreed to supplement these discovery requests as outlined above. Please do not hesitate to contact us with any further questions.

Sincerely,

Taft Stettinius & Hollister LLP



Bradley J. Walz